

EXHIBIT E

From: [Martin, Allison L.](#)
To: [Bloom, Elise M.](#); [Cole-Chu, Hannah](#)
Cc: [Batten, Mark W.](#); [Philion, Rachel S.](#); [Baddish, Noa](#); [NMReiter@venable.com](#); [Goldberg, Pinchos](#); [Bloomberg Plaintiffs Attorneys](#)
Subject: RE: Wood v. Bloomberg; Wisconsin class representative
Date: Tuesday, January 31, 2023 6:08:02 PM

Counsel,

We have considered your email and are not willing to agree to your proposal regarding the substitution of Alan Robinson with Tristan Angulo as the proposed Wisconsin class representative. Your reference to the Campaign's opposition to Plaintiffs' motion for leave to amend (ECF No. 282 at 9-10) mischaracterizes the Campaign's prior position and the legal authority cited therein, and is not applicable given the current procedural posture of this action. The Campaign intends to oppose any efforts to substitute Mr. Angulo for Mr. Robinson at this point in the case.

Allison Martin

Senior Counsel
(she/her)

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Please consider the environment before printing this email.

From: Bloom, Elise M. <ebloom@proskauer.com>
Sent: Friday, January 27, 2023 5:59 PM
To: Cole-Chu, Hannah <HColeChu@outtengolden.com>
Cc: Martin, Allison L. <AMartin@proskauer.com>; Batten, Mark W. <mbatten@proskauer.com>; Philion, Rachel S. <rphilion@proskauer.com>; Baddish, Noa <nbaddish@proskauer.com>; NMReiter@venable.com; Goldberg, Pinchos <pgoldberg@proskauer.com>; Bloomberg Plaintiffs Attorneys <BloombergPlaintiffsAttorneys@outtengolden.com>
Subject: Re: Wood v. Bloomberg; Wisconsin class representative

We will need to discuss and consider our position and will let you know. You should not assume our position on this issue.

Sent from my iPhone

On Jan 27, 2023, at 5:57 PM, Cole-Chu, Hannah <HColeChu@outtengolden.com> wrote:

This email originated from outside the Firm.

Counsel,

We are writing to inform you that Alan Robinson will be withdrawing as Wisconsin class representative and Tristan Angulo will be substituting into that role. Given your prior position that amending the complaint to substitute class representatives is not necessary, ECF No. 282 [at 9-10](#), we assume that providing this notice is sufficient and we can designate Mr. Angulo as a class representative when we move for class certification.

Thank you,

Hannah

Hannah Cole-Chu | Associate

Pronouns: she/her/hers

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HColeChu@outtengolden.com

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